

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JEFFREY PHILLIPS, et al.
SARAH COBURN, et al.
UDO DRESCHER,

05 Civ. 7624 (KMK)(JCF)
05 Civ. 7623 (KMK) (JCF)
05 Civ. 7541 (KMK)(JCF)

Plaintiffs,

ECF CASE

-against-

THE CITY OF NEW YORK, et al.

Defendants.
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**DECLARATION OF JEFFREY ROTHMAN IN SUPPORT OF PLAINTIFFS' MOTION
FOR LEAVE TO FILE A FIRST AMENDED COMPLAINT IN THE PHILLIPS, ET AL.
CASE, TO FILE A SECOND AMENDED COMPLAINT IN THE COBURN, ET AL.
CASE, AND TO FILE A FIRST AMENDED COMPLAINT IN THE DRESCHER CASE**

Jeffrey Rothman, an attorney duly admitted to practice in this Court, pursuant to 28
U.S.C. § 1746, declares as follows:

1. I am counsel for plaintiffs in the above captioned actions and submit this
declaration in support of Plaintiffs' motion for leave to file a First Amended Complaint in the
Phillips, et al. case, to file a Second Amended Complaint in the Coburn, et al. case, and to file a
First Amended Complaint in the Drescher case.

2. The following exhibits, cited in support of plaintiffs' motion for leave to amend,
are attached hereto:

- Exhibit A** Proposed First Amended Complaint in Phillips (a version with red "track
changes" is included along with the final version for the Court's convenience)
- Exhibit B** Proposed Second Amended Complaint in Coburn (a version with red "track
changes" is included along with the final version for the Court's convenience);
- Exhibit C** Proposed First Amended Complaint in Drescher (a version with red "track

changes" is included along with final version for the Court's convenience);

Dated: New York, New York
August 29, 2007

_____/S/_____
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